

# EXHIBIT 32

NO: X06-UWY-CV18-6046436-S : SUPERIOR COURT  
ERICA LAFFERTY : COMPLEX LITIGATION DOCKET  
v. : AT WATERBURY, CONNECTICUT  
ALEX EMERIC JONES : SEPTEMBER 20, 2022  
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NO: X06-UWY-CV18-6046437-S : SUPERIOR COURT  
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET  
v. : AT WATERBURY, CONNECTICUT  
ALEX EMERIC JONES : SEPTEMBER 20, 2022  
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NO: X06-UWY-CV18-6046438-S : SUPERIOR COURT  
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET  
v. : AT WATERBURY, CONNECTICUT  
ALEX EMERIC JONES : SEPTEMBER 20, 2022

BEFORE THE HONORABLE BARBARA BELLIS, JUDGE  
AND JURY

VOLUME III OF III

WITNESS: CLINTON WATTS BEGINNING AT 3:37 TO 4:25

A P P E A R A N C E S :

Representing the Plaintiff:

ATTORNEY CHRISTOPHER MATTEI  
ATTORNEY ALINOR STERLING  
ATTORNEY JOSHUA KOSKOFF  
ATTORNEY MATTHEW BLUMENTHAL

Representing the Defendant:

ATTORNEY NORMAN PATTIS

Recorded By:  
Kendyl Henaghan

Transcribed By:  
Shannon LeRoy  
Court Recording Monitor  
300 Grand Street  
Waterbury, CT 06702

1 (A sidebar conference took place.)

2 THE COURT: First of all (inaudible). Again,  
3 say what you have to say.

4 ATTY. KOSKOFF: Sorry. Got it.

5 THE COURT: Okay. I was (inaudible) at the end  
6 with leading. How many times do you have to say  
7 leading? Again -

8 ATTY. KOSKOFF: I don't know what he's talking  
9 about.

10 THE COURT: But that's not it. So (inaudible)  
11 because of other incidences, there's some kind of  
12 something from somebody. (Inaudible).

13 ATTY. PATTIS: Okay, thank you.

14 THE COURT: Okay, so -

15 ATTY. KOSKOFF: That's going to happen now?

16 THE COURT: (Inaudible).

17 THE COURT: Okay, I think we are ready for our  
18 panel now.

19 (THE JURY ENTERED THE COURTROOM.)

20 THE COURT: Welcome back everyone from the  
21 afternoon break. And the record will reflect that  
22 the entire panel has returned. Please take your  
23 seats and make yourselves comfortable.

24 Whenever you're ready, Attorney Koskoff.

25 ATTY. KOSKOFF: Thank you, Your Honor.  
26  
27

1 C L I N T O N W A T T S ,

2 having been called as a witness, was previously duly  
3 sworn, examined and testified as follows:

4 DIRECT EXAMINATION BY ATTORNEY KOSKOFF CONTINUED:

5 Q Mr. Watts, I want to turn now to asking you whether  
6 or not there came a time when we asked you and your team to  
7 make your best efforts to determine the total reach of Alex  
8 Jones' Sandy Hook lies across all platforms.

9 A Yes, you asked that but I was not able to do that.

10 Q Okay. And why were you - why were you not able to  
11 provide a reasonable estimate as to the total amount of - or  
12 I'm sorry, the total reach of Alex Jones Sandy Hook lies  
13 across all platforms?

14 A There were several categories of missing data. The  
15 first one was Facebook, we had no real Facebook data in  
16 terms of the post seems that were there, so we couldn't see  
17 what the engagements were like. An engagement would be  
18 individuals discussing or reacting or resharing the content,  
19 meaning they share outside of Info Wars social media  
20 handles. So we're really blind to what was on Facebook,  
21 other than a couple samples from reports on Sprout Social.

22 Q Okay, you're kind of going very fast. Why don't you  
23 make the list and I'll come back.

24 A Yeah. The second was Twitter. We were able to pull  
25 snapshots of Twitter but we were not able to see all of the  
26 engagements, all of the posts, all of the content on  
27 Twitter. And that came only from the reports that were

1 provided to us, which were some snapshots but not all.

2           Next in terms of Google Analytics, which we discussed  
3 a few times today. We had reports but we didn't have all of  
4 the data so we don't know what all of the traffic is to the  
5 website. So we don't - don't really have an understanding  
6 of that and we don't understand over the course of all Sandy  
7 Hook content what that traffic was like.

8           And then in relation to videos, whether it be Youtube  
9 videos, videos posted to Youtube or even videos that are  
10 posted to Info Wars. We don't have measurements around what  
11 that reach was in terms of the content.

12       Q    Okay. I'm going to go back over this just to  
13 clarify. And so - and by the way, let me clarify. At the  
14 time we asked you to project only from a six year time  
15 period from 2012 to 2018. Is that right?

16       A    Correct.

17       Q    Okay. And let's start with the data, the Facebook  
18 Data. You said you had some but not the engagements?

19       A    Correct. We didn't -

20       Q    What -

21       A    Yes.

22       Q    Explain the engagements and why that data is - is  
23 relevant or significant to your ability to provide a total -  
24 a total projection across all platforms of his spreading of  
25 the lies?

26       A    When a piece of content goes onto Facebook there are  
27 several things that you can learn. One, you can learn how

1 many people viewed it or how many times was it seen  
2 potentially by someone who has a Facebook account. That  
3 would be known as impressions. You'll see impressions in  
4 some of the charts, even from the reports.

5 Next you don't see the degree to which people  
6 converse or discuss the content. Or even in some cases it's  
7 possible to take the content that's initially put into  
8 Facebook, take it as your own and then resend it to other  
9 people, which would be additional layers of traffic in  
10 Facebook.

11 Q Okay. And so whatever projections you made, they did  
12 not count the additional reach that you would have been able  
13 to ascertain by the engagements?

14 A Correct.

15 Q Okay. By the way, just to ask you the other  
16 question. Were you at least able to come up with a  
17 determination as to a minimal reach across certain platforms  
18 of Alex Jones' spreading of the Sandy Hook lies?

19 A For Sandy Hook lies, we could do a bare minimum  
20 reach, meaning we could account for some travel and social  
21 media in terms of the reach just on platforms.

22 Q Just on social media?

23 A Correct.

24 Q Okay. Did you have - and so - you said - Facebook  
25 you told us, limitations in Facebook data. You said there  
26 was Youtube data.as Was there Youtube data?

27 A There is Youtube data, some.

1 Q Okay. Was that provided by Free Speech Systems or  
2 did you have -

3 ATTY. PATTIS: Objection, foundation, hearsay.

4 THE COURT: Sustained.

5 BY ATTORNEY KOSKOFF:

6 Q You reviewed - did you have - did you yourself and  
7 your team have to dig up Youtube data?

8 A We had to recreate a way to understand what the  
9 Youtube data was by using the Way Back Machine, which is an  
10 archive. It essentially takes a picture of that page on  
11 Youtube and it will show counts that are just a place in  
12 time. So they're not all views ever but it gives you a  
13 snapshot of a place and time, how many views were on that  
14 video.

15 Q Now you mentioned Sprout -

16 A Social.

17 Q Sprout Social. Can you tell the jury what - that  
18 came up in the testimony of the court representative. Could  
19 you just tell the jury what Sprout Social is?

20 A Sprout Social is a analytics platform that you sign  
21 up for a license, you can then run all of your social media  
22 handles, your personas on all platforms through it and it  
23 will aggregate all the analytics to understand literally how  
24 your contents sprouts all across social media.

25 Q Is this a pay service or -

26 A It is.

27 Q Okay. And do you know whether or not Info Wars used

1 Sprout Social for the time period of 2012 to 2018 at least?

2 A Yes.

3 Q What is that, they did or -

4 A They did use it and I've seen the deposition.

5 Q Okay. The deposition, you mean when somebody says  
6 something about - a deposition, did you see any data though?

7 A Yes, I've seen some data around Sprout Social, what  
8 they were able to retrieve.

9 Q Were you able to - did you - were you ever produced  
10 the entire data setup?

11 A No, it was not entirely available because we didn't  
12 understand or have any access or visibility into some  
13 platforms, Facebook being one. The second is really  
14 Infowars.com and the websites.

15 Q And does that - is that the type of thing that  
16 prevents you from giving us a estimate as the total reach of  
17 Alex Jones Sandy Hook lies across all platforms?

18 A Yes.

19 Q Okay. But you - did you - did you try to ascertain  
20 the minimal reach based on the information that you had?

21 A Correct. For the information we could gain we did  
22 come up with an estimated minimum reach.

23 Q Okay. And that was - I think you said that it was  
24 based on Facebook, Youtube and Twitter.

25 A Correct.

26 Q And you didn't have - did you have all the  
27 information for all those sites or did you have to project -



1 make certain projections?

2           ATTY. PATTIS: Asked and answered at this point,  
3 Judge.

4           ATTY. KOSKOFF: This - it's complicated so I'll  
5 rephrase it.

6           THE COURT: Overruled.

7 BY ATTORNEY KOSKOFF:

8       A     For Youtube we used the Way Back Machine to look for  
9 videos related to Sandy Hook that were put out by Alex Jones  
10 and Free Speech Systems. They - we then looked at those  
11 counts. That's how we came up with the estimate for  
12 Youtube. And that's a bear minimum count because we know  
13 that more people could have watched it after that, we just  
14 have no way of looking at it. And it's only the videos we  
15 could service on the Way Back Machine.

16       Q     Okay. And in terms of - we've showed the jury Info  
17 Wars content and can you just describe for the jury what  
18 type of website Infowars.com is in terms of its scale as an  
19 original website?

20       A     Yes, due to the duration that it's been in existence,  
21 it has created an enormous direct traffic, meaning while  
22 social media redirects some people to the website, many  
23 people go directly to the website. And you can see that in  
24 Google Analytics, some of the (inaudible) we showed you it  
25 says direct, that means someone went directly to  
26 Infowars.com.

27       Q     And is that - is it unusual or is there anything

1 unusual about the degree to which Info Wars gets direct  
2 traffic in terms of the types of -

3 A Yes. Based on my experience evaluating websites,  
4 Infowars.com gets a very high percentage of direct  
5 engagement to the website. Meaning people come there for  
6 the information, it's not - they're not routed there through  
7 social media.

8 Q And can you - did you and your team maybe quantify  
9 that?

10 A We couldn't get any real estimates other than the  
11 Google Analytics pages we already reviewed.

12 Q Okay. And so - and you were - did not have the  
13 direct content from - or the direct data from Infowars.com  
14 to factor in this question about determining the total reach  
15 of Alex Jones Sandy Hook lies across all platforms.  
16 Correct?

17 A Correct.

18 Q Okay. And then what about - is that also true for  
19 Prison Planet, one of its sister sites?

20 A Correct.

21 Q All right. And what about radio, do you have  
22 significant data from radio?

23 A Radio I had no significant data.

24 Q Okay.

25 A Other than the media kits that were provided.

26 Q All right. So now tell us about what you and your  
27 team did in terms of trying to come up with at least a

1 minimum projection based on what the platforms that we spoke  
2 of, Youtube, Twitter, Facebook.

3 A For those three platforms we did the following. For  
4 Youtube we went to the Way Back Machine, we looked for Sandy  
5 Hook related content and then we aggregated the number of  
6 views as a place in time.

7 Q Okay, hang on one second. Aggregate, what does that  
8 mean?

9 A That means we added the numbers together from every  
10 snapshot that we could find related to Sandy Hook content.

11 Q And how did you go about finding the content in the  
12 first place?

13 A We went to the Way Back Machine knowing that videos  
14 been put out. We then searched that to search snapshots on  
15 Youtube.

16 Q Okay. And you - aggregated means you added the views  
17 and the time together?

18 A For each video.

19 Q Okay, all right. And that's - is that a complicated  
20 thing or not?

21 A It's time consuming and - and takes quite a bit of  
22 time to find all those and know that you have come close to  
23 finding as much of the information as you can.

24 Q Okay. So it's time consuming but is it particularly  
25 complicated?

26 A No.

27 Q Okay. So - and then in terms of Twitter - sorry, and

1 what were - what were those numbers?

2 A It was just over nine million views that we could  
3 speak to just the minimum number of views for Sandy Hook  
4 related content on Youtube.

5 Q For a period of time?

6 A Over a period of time.

7 Q Okay. And in terms of Twitter, how did you go about  
8 calculating Twitter or these views?

9 A For Twitter we used the Sprout Social data that was  
10 provided. We went back through and looked at what was the  
11 number of views on days where Sandy Hook related content was  
12 discussed on Info Wars.

13 Q Okay. And is this a rough science or -

14 A It's as close as we can get.

15 Q Okay. And it was a time consuming enterprise as  
16 well?

17 A Yes.

18 Q How do you - are we at the point where you searched  
19 terms?

20 A Yes. At times we would use search terms to try and  
21 figure out from the Sprout Social data and from just all of  
22 Info Wars content over time, which days were related to  
23 Sandy Hook.

24 Q And did you hundreds and hundreds of search terms?

25 A We did.

26 Q And can you give the jury an example of what type of  
27 search terms you would have used?

1 A Sandy Hook actor crises, crises actor, different  
2 combinations like that.

3 Q Okay. Did you have to use some of the plaintiffs'  
4 names?

5 A Yes.

6 Q Okay. And through a combination of using those  
7 search terms and Twitter or Sprout -

8 A Sprout Social.

9 Q Thank you, Sprout Social, you were able to come up  
10 with a number, an estimate?

11 A Yes.

12 Q And what was that?

13 A It came in right around 100 million in terms of  
14 views.

15 Q Okay. And then in terms of - now what about  
16 Facebook? You didn't have - you didn't have the Facebook  
17 data, I think you said -

18 A Correct.

19 Q - engagement. So how did you go about calculating  
20 Facebook?

21 A In one of the charts from Google Analytics, it's  
22 called a flow chart. It had the redirect, meaning when did  
23 social media direct back to Infowars.com. And based on that  
24 we were able to build a rough estimate of if this many  
25 Twitter tweets essentially redirected back to Info Wars, you  
26 could see the ratio of how many from Facebook redirected  
27 back.

1 Q And just in terms of your experience in this area  
2 for, what was it, almost 20 years looking at social media  
3 and networks and things like that.

4 A 2005 to present, 17.

5 Q Can you just give the jury kind of a scale of  
6 Facebook as it compares to like Youtube or something?

7 A Facebook has an enormous reach. If your moving  
8 content and creating dialog and discussion, if you're  
9 getting it onto channels, which are pages on Facebook, or if  
10 you're trying to build an audience, Facebook is the primary  
11 platform for that.

12 Q And again, the projections you're making are for the  
13 years 2012 to 2018. Right?

14 A Correct.

15 Q Okay. And - and so is Facebook - is Facebook larger  
16 than Youtube in its reach?

17 A Far larger.

18 Q And twitter?

19 A Yes.

20 Q Okay. So I think the document - so did you have to  
21 make some estimations or projections based on data that you  
22 did have to determine the Facebook reach?

23 A That is correct.

24 Q All right. I think you talked about a flow chart.  
25 Why don't we bring that up, Exhibit 454 for the jury?

26 THE CLERK: That is not a full exhibit.

27 ATTY. KOSKOFF: It's not a full exhibit?

1           ATTY. PATTIS: I didn't hear a foundation,  
2           Judge. I have to hear a foundation.

3           ATTY. KOSKOFF: Okay, we move to introduce 454  
4           as a full, it's a flow chart that was testified to by  
5           the witness.

6           THE COURT: Objection, lack of foundation. So  
7           can you lay a foundation?

8           ATTY. KOSKOFF: This was one of the handful of  
9           Google documents that they produced.

10          ATTY. PATTIS: I still haven't heard a  
11          foundation, Judge.

12          ATTY. KOSKOFF: It's just been identified.

13 BY ATTORNEY KOSKOFF:

14       Q   Is it up on your screen, sir?

15       A   Yes.

16       Q   Is that the Google document that you used to  
17       evaluate - to make your projection as to the reach of  
18       Facebook during the calendar years 2012 to 2018?

19       A   Yes.

20          ATTY. PATTIS: No objection, Judge.

21          ATTY. KOSKOFF: Can we show that - I'd like to  
22          show that to the jury. Move to admit as full,  
23          Attorney Ferraro.

24          THE COURT: So ordered.

25          ATTY. KOSKOFF: Thank you, Judge.

26 BY ATTORNEY KOSKOFF:

27       Q   So this is not helping right now because it's hard to

1 see. Can we just blow that up? Is this the document that  
2 you used to help make this estimate?

3 A Yes. It shows the flow from social media to  
4 Infowars.com.

5 Q Okay. So what are we looking at here in terms of -  
6 please explain more about what - how you were able to  
7 extrapolate these numbers by using this analytics?

8 A Yes. If you look to the left, the three social media  
9 platforms that are listed from top to bottom are Facebook,  
10 Twitter and Youtube. Starting from Youtube, that's where we  
11 started our foundation. You'll see that it shows about 3.9  
12 million redirects. Then you'll see Twitter as 33 million,  
13 and then you see Facebook is 151 million.

14 So what we did is we just created the ratio to make  
15 the estimate. Meaning we looked at if there is 33 million,  
16 how does that relate to 151 million. That's roughly five  
17 times in terms of ratio.

18 Q So you took the twitter numbers and you multiplied it  
19 times five?

20 A Yes.

21 Q And is this in accordance - I mean this isn't the  
22 first - how many times have you looked at data like this,  
23 you and your team, in - for governments or for financial  
24 institutions or those kinds of organizations?

25 A I've looked at hundreds of these.

26 Q Okay. And is that - is that ratio consistent with  
27 your experience?



1       A     It depends on who the audience is receiving this.  
2 Facebook is very high for this audience.

3       Q     Okay. And we saw that - I believe we just saw the  
4 pie charts -

5       A     Correct.

6       Q     Okay. And so if you can tell us then or we can - oh,  
7 I want to ask you this. Right down in the - what are these  
8 analytics showing right under the 178 million starting  
9 sessions there?

10      A     Yeah, so in addition to just lands on Infowars.com  
11 it's also showing you specific pages which drew a  
12 significant amount of traffic. And so those are pages,  
13 watch Alex Jones and then the one that we had actually  
14 discussed earlier, which is regarding FBI, it says nobody  
15 killed at Sandy Hook. So that is in and of itself just in  
16 terms of redirects, 2.8 million.

17      Q     So does this - what is the significance of this  
18 evidence in relationship to the degree to which Sandy Hook  
19 played a prominent - not prominent role in the growth of  
20 Info Wars since December 14<sup>th</sup>, 2012?

21      A     From this chart alone, you can see that it's one of  
22 the top five landing pages across all the Info Wars  
23 platform.

24      Q     Okay. And in fact, it's about - it's not in fact -

25               ATTY. PATTIS: Objection, leading.

26 BY ATTORNEY KOSKOFF:

27      Q     Is it - okay, so withdrawn. Down at the - it says 12

1 more pages. So what does that mean, 12 more pages, 6  
2 million?

3 A Meaning adding 12 pages together the way to interpret  
4 this, it comes to 6 million.

5 Q Okay. And the FBI says Sandy Hook article with the  
6 story is almost half of that next 12?

7 A Yes.

8 Q Okay.

9 A That's from social media redirect to Infowars.com.

10 Q Okay. We can take that down. So let me ask you now.  
11 You shared with us the methodology you just went over in  
12 which you arrived at a projection. Is that the methodology  
13 you and your team used?

14 A Yes.

15 Q Okay. So let me ask you, can you tell us to - what  
16 your conclusions were about what a minimum reach was based  
17 on these three platforms, the information you learned from  
18 these three platforms of Alex Jones Sandy Hook lies across  
19 these three platforms?

20 A Adding together Youtube, Twitter and the Facebook  
21 calculation together just related to lies about Sandy Hook,  
22 the minimum audience that we could measure was 550 million  
23 off just social media. That doesn't include any - any  
24 individuals that were going straight to the website.

25 Q No Info Wars, no Prison Planet, not radio, no other  
26 avenues of getting the information?

27 A Correct.

1 Q Okay. And the time period of that was between what?

2 A I - 2012 to 2018.

3 Q Okay. Thank you, very much. I appreciate it.

4 A Thank you.

5 THE COURT: Attorney Pattis, cross examination?

6 ATTY. PATTIS: Thank you, Judge. May we  
7 approach, Your Honor?

8 THE COURT: You may.

9 (A sidebar conference took place.)

10 ATTY. PATTIS: We're not going to finish today.  
11 I don't know what that does. And I'm told he won't  
12 be able to be back tomorrow. Is that right?

13 ATTY. KOSKOFF: (Inaudible).

14 ATTY. PATTIS: No, I'm ready to go, I just  
15 wanted to make sure that you were aware of it.

16 THE COURT: I will explain to the jury  
17 (inaudible)

18 ATTY. PATTIS: Perfect.

19 THE COURT: (Inaudible).

20 ATTY. PATTIS: May we have an order that he is  
21 not to discuss his testimony during the pendency of  
22 the cross examination?

23 THE COURT: What? I've never heard that.

24 ATTY. PATTIS: It's routine in criminal cases.  
25 I know we're not in Criminal Court (inaudible).

26 THE COURT: I can tell him not to talk to your  
27 clients or your witnesses.

1           ATTY. PATTIS: We're in the middle of cross  
2 examination.

3           THE COURT: Yeah. But listen, I'm going to tell  
4 the jury though that he'll be back on Friday. Right?

5           ATTY. PATTIS: Yes, ma'am.

6           ATTY. KOSKOFF: You can describe that that  
7 happens from time to time with experts.

8           THE COURT: Yes.

9           ATTY. KOSKOFF: Sorry, Judge. This is my first  
10 trial.

11          THE COURT: This isn't my first trial either.  
12 Right? Okay.

13          I'm actually going to tell the jury about the  
14 sidebar we just had so that they can know what's  
15 coming down the pike.

16          So we're - Attorney Pattis will start with his  
17 cross examination of this witness now. We are going  
18 to end at 4:30 today. Hopefully if I lose track of  
19 the time, Mr. Ferraro, you will let me know.

20          And then we are going to pick this witness'  
21 testimony up on Friday. Okay?

22          This is routine in cases. Not anything unusual  
23 about it, nothing for you to worry about. But just  
24 so that you know, we'll go to 4:30, leave a little  
25 early today and then we'll see Mr. Watts again on  
26 Friday. Okay?

27          All right. Whenever you're ready, Attorney

1 Pattis. Take your time.

2 ATTY. PATTIS: Thank you, Judge.

3 CROSS EXAMINATION BY ATTORNEY PATTIS:

4 Q Good afternoon, Mr. Watts. How are you?

5 A I'm good.

6 Q My name is Norm Pattis. We've never met before?

7 A No, not that I'm aware of.

8 Q And you - I'd like to thank you for your service  
9 obviously in the military. You've written a book called  
10 Messing with the Enemy, Surviving in a Social Media World of  
11 Hackers, Terrorists and Fake News. Correct?

12 A Correct. That's not the full title but, yeah.

13 Q That's how it's listed on - well actually, you're  
14 right. Messing with the Enemy, Surviving in a World of  
15 Media - in a Social Media World of Hackers, Terrorists,  
16 Russians and Fake News. That's how it's listed on the  
17 website as foreign policy research -

18 A Correct.

19 Q And that's what it says on the dust jacket. Correct?

20 A Yes.

21 Q And you were quite autobiographical in that book.  
22 Correct?

23 A Correct.

24 Q You describe your reasons for going to West Point.  
25 Correct?

26 A Yes.

27 Q You weren't quite big enough to make the football

1 team and got an interest in military history and told your  
2 mother when you were about 15, I'm going to West Point.

3 Correct?

4 A Yes.

5 Q And you did go to West Point.

6 A I did.

7 Q And while you were at West Point there's a - is it a  
8 fixed curriculum for all cadets there, sir?

9 A For the first half of it, yes.

10 Q And -

11 A And then you chose your major.

12 Q You also - yeah, that's right. You get to pick a  
13 concentration. Correct?

14 A Correct.

15 Q So when you described it as a liberal arts education,  
16 certainly it's a well-rounded education.

17 A It is.

18 Q The purpose is to support an officers more capable of  
19 meeting - leading our military in whatever foreign challenge  
20 we may face.

21 A Yes.

22 Q Would that be a challenge foreign or domestic?

23 A For the military it's foreign.

24 Q Well, when you take your oath -

25 A The oath is foreign and domestic, yes.

26 Q When you take your oath to protect and defend the  
27 Constitution against - of the United States against all

1 enemies foreign and domestic.

2 A Correct.

3 Q Is Alex Jones a domestic enemy?

4 A No.

5 Q Now the - and West Point was a difficult curriculum.

6 Correct?

7 A Yes.

8 Q And it could be somewhat, I don't know if this is the  
9 right term, brutalizing for a young cadet. Correct?

10 There's a certain amount of hazing that goes on.

11 A Correct.

12 Q And the cadets get some frustration and have to work  
13 that frustration out in a number of ways.

14 A Yes.

15 Q And you wrote about your doing so.

16 A I did.

17 Q A fellow named Carpheze (phonetic) was a target of a  
18 lot of your pranks. Correct?

19 A Correct.

20 Q Carpheze was the person who operated the meat  
21 purchasing -

22 A Yes.

23 Q - in the food service and you found a list of phone  
24 numbers. Correct?

25 A Yes.

26 Q And you impersonated other people at the institution  
27 and gave Carpheze any number of messages, false messages.

1 A I impersonated - yes, in his organization, yes.

2 Q Yeah, in the hierarchy at West Point. Correct?

3 A Yes.

4 Q Carpheze, bring me more meat patties, the kids are  
5 starving up here, and then you'd hang up on him. Correct?

6 A Yes.

7 Q And you tried to impersonate the voices of others so  
8 that Carpheze would fall for it. Correct?

9 A Correct.

10 Q And Carpheze ultimately said to you, words to the  
11 effect of, why are you fucking with me like this?

12 A Yes. He didn't use that word but -

13 Q What were you doing?

14 A It was something as a prank joke that we did there.

15 Q Okay, okay. And certainly nothing in this case  
16 suggests to you that anybody was involved in a prank joke.  
17 Correct?

18 A No.

19 Q Now at West Point in the liberal arts portion of the  
20 curriculum you read a number of classics. Correct?

21 A Yes.

22 Q Including the Art of War by Sun Tzu. Correct?

23 A Different excerpts, yes.

24 Q And you understood that in Sun Tzu's mind politics is  
25 warfare by - and you also read Carl Von Clausewitz.  
26 Corrects?

27 A At different times, yes.



1 Q And you recognize that Clausewitz relying on Sun Tzu  
2 taught cadets politics is war by other means. Correct?

3 A Yes.

4 Q And you in your career has come - have come to  
5 realize that social media is politics by other means,  
6 particularly (inaudible) dangerous form of politics.  
7 Correct?

8 A With respect to Russia in particular, yes.

9 Q In the United States too.

10 A Yes. Not where I focus my energy but, yes.

11 Q Well you've taken aim in your book on what you call  
12 social media nationalist. Correct?

13 A Yes.

14 Q And click bate populism. Correct?

15 A Correct.

16 Q That undermines the intelligence, basically a crowd,  
17 it's the people. Correct?

18 A Yes.

19 Q It poses in your mind an existential threat to the  
20 health and security of the republic. Correct?

21 A It can.

22 Q It does. Doesn't it?

23 A I didn't say that.

24 Q It's hard to know how to respond to social media.  
25 Isn't it?

26 A I don't know, it depends on each individual's  
27 familiarity with social media.

1 Q You wrote that on - that we want to have a free  
2 exchange of ideas. Correct?

3 A Yes.

4 Q But how to deal with that in a world of (inaudible)  
5 and social media, that's the challenge that we don't know  
6 how to meet yet. Correct?

7 A It depends on which country and which place.

8 Q Well let's talk about the United States right here  
9 right now. Social media poses a threat to our civic norms.  
10 Does it not?

11 ATTY. KOSKOFF: Objection.

12 BY ATTORNEY PATTIS:

13 A I didn't say that. It can.

14 THE COURT: Just wait.

15 ATTY. KOSKOFF: Your Honor, objection.

16 THE COURT: Basis?

17 ATTY. KOSKOFF: Motions in limine - or it's  
18 beyond the scope of what he's testified to.

19 ATTY. PATTIS: It's getting -

20 THE COURT: Well, why don't we go on and see  
21 where we're going. But this case is not about  
22 politics.

23 BY ATTORNEY PATTIS:

24 Q You knew about Info Wars before you were retained by  
25 Attorney Koskoff and his firm in January of this year.  
26 Correct?

27 A Yes.

1 Q And you wrote about Info Wars. Correct?

2 A I think I mentioned Info Wars at different times in  
3 several things I've written over the years.

4 Q You included criticism of it for being controversial.  
5 Correct?

6 A You'd have to reference what it is. I don't have it  
7 at my fingertips.

8 Q Okay.

9 A I've written - just for reference, I've written  
10 several books and several hundred articles, so if you can  
11 refresh my memory what you're pointing to.

12 Q Well, one of the books you wrote was fiction.  
13 Correct? Real Fake, it's about 70 pages long. That's your  
14 effort to write fiction. Isn't it?

15 A It was -

16 Q That's you. Isn't it?

17 A It was with a team, yes.

18 Q That's you writing fiction. Is it?

19 A Yes, it was -

20 Q What was the other book you wrote?

21 A It was called Bug Bites.

22 Q Called what?

23 A Bug Bites. It's the same series.

24 Q Well that's another piece of fiction?

25 A Yes.

26 THE COURT: Sorry, I just need to make sure I  
27 and the jury can follow. Just make sure that we're

1 not interrupting.

2 BY ATTORNEY PATTIS:

3 Q So you wrote - you've written three books, the book  
4 on social media, World of Hackers, Terrorist -

5 A Can I correct you because that's not correct.

6 Q - and two pieces of fiction. Correct?

7 A Okay.

8 THE COURT: So I lost that question. Do you  
9 mind -

10 ATTY. PATTIS: Let me try it again, I'll do it  
11 again, Judge, and I'll slow down. I'm sorry, it's  
12 the end of the day.

13 BY ATTORNEY PATTIS:

14 Q You've written three books.

15 A No. I wrote one book, I co-authored two others.

16 Q You participated in the writing - well you told us  
17 before about books, plural. So you - these are the books  
18 we're talking about. Correct?

19 A Yes.

20 Q One book entitled, Messing with the Enemy, Surviving  
21 in a Social Media World of Hackers, Terrorists, Russians and  
22 Fake News. That's nonfiction?

23 A Correct.

24 Q And two pieces of fiction that you wrote with others.  
25 Correct?

26 A Yes.

27 Q Any other books?

1 A No.

2 Q You wrote a series of articles, maybe hundreds of  
3 articles. Correct?

4 A Probably.

5 Q You also worked with something called the Foreign  
6 Policy Research Institute. Correct?

7 A Yes.

8 Q Are you still there?

9 A Yes, I'm still a Fellow there.

10 Q You're not just a Fellow, you're a Distinguished  
11 Fellow there. Correct?

12 A Correct.

13 Q And you're also a Non-resident Fellow at the Alliance  
14 for Securing Democracy. Correct?

15 A Correct.

16 Q You're a National Security Consultant for NBC News.  
17 Correct?

18 A Yes.

19 Q And for MSNBC?

20 A NBC News, MSNBC, CNBC.

21 Q How about Fox?

22 A No.

23 Q Why not?

24 A I'm hired by NBC News.

25 Q I didn't ask that. Have you ever - you've never been  
26 a commentator on Fox News?

27 A I've been on Fox News.

1 Q Okay. Now among the articles that you wrote, you  
2 wrote a recent article at least in April - well you wrote  
3 something in April of 2022, Climate Change in National  
4 Security. Correct?

5 A That was a podcast series.

6 Q And -

7 A Had a written header that went with the six - or  
8 excuse me, three on climate change.

9 Q You have a - have you ever - okay. So you've never  
10 written an article called, Climate Change in National  
11 Security for Orbis?

12 A I - yes, I contributed to it. It was a part of a  
13 bundle of podcasts, yes.

14 Q You also wrote a piece in the Washington Post in 2018  
15 called, Artificial Intelligence is Transforming Social Media  
16 and American Democracy Survive. You wrote that?

17 A Correct.

18 Q And you wrote something in January of 2018, Terrorism  
19 in Social Media, is Big Tech Doing Enough. Correct?

20 A Yes.

21 Q Was that a review of Shoshana Zuboff's book,  
22 Surveillance Capitalism?

23 A No.

24 Q Do you know Shoshana Zuboff's work?

25 A Vaguely, yes.

26 Q You've not read it?

27 A No.

1 Q You've not read the Age of Surveillance Capitalism?

2 A I've read about the book, yes.

3 Q But you've not read it?

4 A No.

5 Q You know that -

6 (Inaudible, the parties spoke over each other.)

7 ATTY. KOSKOFF: Hold on. He doesn't have  
8 knowledge, he hasn't read the book and now he's going  
9 to talk about Shoshana Zuboff.

10 THE COURT: He can ask the question, if he  
11 knows -

12 BY ATTORNEY PATTIS:

13 A I understand the concept of surveillance capitalism,  
14 yes.

15 Q That wasn't my question, sir. You know that Shoshana  
16 Zuboff is a Professor at Harvard?

17 A Yes.

18 Q In the business school.

19 A I - maybe, yes. I just know she's affiliated with  
20 Harvard.

21 Q And surveillance capitalism, you say you're familiar  
22 with the concept. That overlaps - well withdrawn. That is  
23 a social media phenomena. Is it not?

24 A To some degree but not entirely.

25 Q If it involves the use of anger to manipulate people.  
26 Correct?

27 A In - for surveillance capitalism?

1 Q Yeah.

2 A It can.

3 Q And fear. Correct?

4 A It can.

5 Q And demonization. Correct?

6 A Yes, it can be used.

7 Q The concept is that by giving us access to social  
8 media sites like Twitter, Facebook and whatnot for free,  
9 we're actually giving something of value to those who offer  
10 up these things for free. Correct?

11 A It's a part of the agreement.

12 Q We are making a digital footprint. Correct?

13 A Yes.

14 Q That digital footprint yields with information about  
15 us. Correct?

16 A It does.

17 Q That information yields information about us that can  
18 be used to manipulate us. Correct?

19 A It can be.

20 Q Because it will target us based on what we fear.  
21 Because what they draw - the ways these firms are designed  
22 is they draw us in based on what attracts us and what  
23 attracts us -

24 A Yes.

25 Q - is dispute, anger, demonization.

26 A Yes.

27 Q So and when you wrote your piece -



1                   ATTY. PATTIS: May I have a moment, Judge?

2                   THE COURT: Take your time.

3 BY ATTORNEY PATTIS:

4           Q    When you wrote your piece about big tech, were you  
5 concerned about big tech's manipulation of the general  
6 public based on its pedaling fear to harvest our data -

7           A    No, it was about -

8           Q    - to sell us things?

9           A    No.

10          Q    Okay. Have you ever written about that?

11          A    About big tech or manipulators?

12          Q    About big tech as a manipulator harvesting our data  
13 for free to manipulate us for commercial purposes?

14          A    The article was not in relation to that as the actor,  
15 no.

16          Q    I didn't ask you about that article.

17          A    No.

18          Q    Have you ever written about it?

19          A    About big tech, as in the companies?

20          Q    Yeah.

21          A    The companies manipulating people?

22          Q    Yeah, exactly.

23          A    I've written about -

24          Q    You know exactly what I'm talking about.

25          A    I've written about how the platforms can be used to  
26 manipulate people.

27                   ATTY. KOSKOFF: I'm sorry -

1 THE COURT: All right,

2 BY ATTORNEY PATTIS:

3 Q Have you ever written -

4 THE COURT: Excuse me. Thank you. So I think  
5 that we just need to not interrupt each other.

6 ATTY. KOSKOFF: Right.

7 THE COURT: I think you're both interrupting  
8 each other. So let's slow it down a little bit so we  
9 can follow.

10 BY ATTORNEY PATTIS:

11 Q What have you written about big tech's manipulation  
12 of us on the basis of negative emotions to sell us things  
13 and control things?

14 A Again, I don't think your question is stated in a way  
15 that I can answer.

16 Q Okay, then don't.

17 A You're saying the actor is big tech. I'm saying,  
18 it's people that use technology to manipulate.

19 Q You don't think people that own big tech companies  
20 use technology to manipulate? Is that your testimony, sir?

21 A No. I think they're trying to offer a service to the  
22 public that they have some responsibility for how the  
23 conduct of activity is on that platform. But I'm not saying  
24 that the companies are going and trying to do the  
25 manipulation themselves.

26 Q Really?

27 A Correct.

1 Q That's your sworn testimony under oath in this  
2 courtroom?

3 A I - I have not seen a company that's trying to  
4 manipulate people from the corporate perspective. You can  
5 pick companies that use it.

6 Q Okay, that's fine. You've testified in Congress a  
7 number of times. Correct?

8 A Correct.

9 Q In 2015 you testified about Isis. Correct?

10 A Yes.

11 Q In 2015 you testified about the Paris attacks  
12 involving Charlie Hebdo. Correct?

13 A Yes.

14 Q In 2016 you testified about Brussels terrorist  
15 attack. Correct?

16 A Correct. I believe -

17 Q And you testified -

18 A - it was 2016 for that.

19 Q That's what - I thought I said that. If I mistaken -

20 A The previous one you said 2015. I think all of those  
21 were related to one hearing.

22 Q Okay. Let's - well, are you sure about that? Have  
23 you ever read your Wikipedia page, sir?

24 A I have.

25 Q And if your Wikipedia talks about your testifying  
26 multiple times at US Congress and it lists one as the 2015  
27 regarding Isis, another as the Paris attacks in 2015,

1 another as Brussels in 2016. You think that your page is  
2 wrong?

3 A I know my page is wrong because you can go to the  
4 edits on that page and you'll see that there have been many  
5 manipulations on two include eastern European bots and IP  
6 addresses.

7 Q Oh, so the Russians are messing with you?

8 A I don't know. Are they?

9 Q You tell me, you're the expert.

10 A This I knew with the Wikipedia page, yes.

11 Q So the bots are after ya, are they?

12 A I didn't say that.

13 Q What were you trying to suggest with that testimony,  
14 sir?

15 A I'm just saying that with regards to Wikipedia, you  
16 asked me if I'd read it and I have. I've also read where it  
17 is manipulated as well.

18 Q And you testified about Russian interference in the  
19 elections in 2016. Correct?

20 A I testified in 2017 about the manipulations in 2016.

21 Q Okay. And you testified in 2017. Didn't you?

22 A Correct.

23 Q And you've testified in front of the United States  
24 Armed Services Subcommittee on cyber security. Correct?

25 A Correct.

26 Q And among the topics you testified to at that  
27 committee hearing was artificial intelligence in social

1 media. Correct?

2 A No.

3 Q Russian black propaganda. Correct?

4 A Yes.

5 Q While you were at West Point - well withdrawn. I  
6 guess I can ask it that way. While you were at West Point  
7 did you develop a view that propaganda was politics by  
8 another means? You remember the extension, politics is  
9 warfare by another means propaganda social media is politics  
10 by other means. Did you develop that viewpoint at West  
11 Point or thereafter?

12 A Thereafter.

13 Q Okay. While you were at West Point - and you went  
14 from West Point - I forgot when you graduated, was it 91?

15 A No.

16 Q What year?

17 A No, 1995.

18 Q Oh.

19 A I'm not sure what my Wikipedia page says but 1995.

20 Q I'm not asking about your Wikipedia page, I didn't  
21 get it from there. What year did you graduate from West  
22 Point?

23 A 1995.

24 Q Okay. And you worked for the - you worked for the  
25 FBI briefly. Correct?

26 A Yes.

27 Q About a year.

1 A Three times.

2 Q You worked for the FBI briefly after graduating  
3 college. Correct?

4 A No, after I left the army.

5 Q Okay. And you went to the army for 7 years.  
6 Correct?

7 A Correct.

8 Q And then you went to the Monterey Institute of  
9 International Studies. Correct?

10 A Correct.

11 Q It's now I guess - did Middlebury College in  
12 Vermont -

13 A They were acquired by Middlebury.

14 Q Were you at the Monterey Institute while - at the  
15 time Middlebury purchased it?

16 A No.

17 Q Or acquired it.

18 A After, after I had graduated.

19 Q What did you study at the Monterey Institute?

20 A International Security and Development.

21 Q Now in the course of your education at West Point and  
22 at the Monterey Institute, you became familiar with the  
23 works of a German Sociologist named Max Weber. Correct?

24 A Yes, in graduate school.

25 Q And you obviously read, I'm assuming you read his  
26 essay, Politics is a Vocation. Correct?

27 A I don't recall.

1 Q Do you recall his discussion -

2 A I've read several of his works, I don't know which  
3 ones.

4 Q You recall his discussion of charismatic authority?

5 A No.

6 Q You don't?

7 A I don't.

8 Q What did you read (inaudible)?

9 A It was 17 years ago at least, maybe 18, I'm not sure.

10 Q So are you familiar with the distinction between  
11 charismatic, bureaucratic congressional authority in Max  
12 Weber's work?

13 A No.

14 Q Okay. Now you testified earlier today about the  
15 course of your career. Was it 7 years you were in the  
16 military?

17 A Yes.

18 Q When out to the FBI, went to Quantico. Correct?

19 A Correct.

20 Q Spent four months at Quantico. Correct?

21 A And in Quantico, the four months you spent there,  
22 that was for the training that all Agents receive. Correct?

23 A Truth.

24 Q And upon completing that training, all Agents are  
25 called Special Agents.

26 A Correct.

27 Q I mean it's not this so there's two classes of

1 Agents, every FBI Agent is special. Right?

2 A Correct.

3 Q And among the things that - that you were taught in  
4 Quantico, I think you told us that you did some work on  
5 searches and seizures.

6 A Yes.

7 Q On the basics of the law regarding crimes and so  
8 forth -

9 A Correct.

10 Q - and how to investigate? And you developed some  
11 comprehension of the Rules of Evidence. Correct?

12 A Yes.

13 Q Because the purpose was for you to prepare for a  
14 career as an investigator of crimes.

15 A Yes.

16 Q And the - among the other classes that you took at  
17 the FBI was a class in preparing you how to testify in  
18 situations like this in court.

19 A Yes.

20 Q But you've never testified as an expert in a  
21 courtroom before.

22 A No.

23 Q Have you ever testified in a courtroom before at all?

24 A No.

25 Q So this is your first time?

26 A As I said, yes, testifying.

27 Q But not - you have testified before Congressional



1 Committees. Correct?

2 A Correct.

3 Q And you've appeared at a number of other - you told  
4 us about what's that, lecturing to or presenting to the Los  
5 Angeles Police Department?

6 A At times, yes.

7 Q The New Jersey State Police. Correct?

8 A Correct.

9 Q Dozens of police departments across the country.

10 A Yes.

11 Q Anywhere in Connecticut?

12 A No.

13 Q So this is your first time talking to folks in  
14 Connecticut?

15 A I believe so, yes.

16 Q Welcome to (inaudible). You testified to US  
17 Intelligence Officers or agencies. Correct?

18 A I didn't testify to them but I've talked to them.

19 Q Presented I should say.

20 A Presented.

21 Q US Military.

22 A Yes.

23 Q You've taught at the FBI.

24 A Yes.

25 Q And your work with respect to the Intelligence  
26 Committee that you made a point of saying that sometimes the  
27 testimony was not classified, it was open source. Correct?

1 A Correct.

2 Q Other times it was classified. Correct?

3 A Testimony to the Congressional Committees?

4 Q No, sir. I'm sorry if I was confusing, it's late in  
5 the day. I thought I heard you say earlier today that you  
6 presented to Intelligence Committee or Intelligence  
7 Organizations in the United States.

8 A Intelligence Organizations, yes.

9 Q And with - in response to a question Attorney Koskoff  
10 asked you, you said some of that testimony was open source.  
11 Correct?

12 A Not testimony but yes, briefings and presentations  
13 I've given are open source.

14 Q Briefings statements.

15 A Yes.

16 Q Some of those briefings were confidential. Correct?

17 A Yes.

18 Q Have you ever heard the expression, deep state  
19 before?

20 A Yes.

21 Q What does that mean to you, sir?

22 A Usually it's a reference, a derogatory one towards  
23 the belief that there is a secret or a deep state or a  
24 separate state that's running the government.

25 Q Why do you say it's derogatory?

26 A It's generally used to say that it's not an official  
27 capacity.

1 Q I see. Or sometimes it's used to say it is an  
2 official capacity but there are secrets our government keeps  
3 from us. Correct?

4 A If they are classified, yes.

5 Q And you keep some of those secrets from us if you  
6 believe them to be classified. Correct?

7 A Yes, correct.

8 Q Have you ever read a book by a woman - in the course  
9 of your studies and preparing to testify here, a book by a  
10 woman named Anna Merlin called Republic of Lies?

11 A No.

12 Q Have you ever heard of the book?

13 A No.

14 Q Have you made any effort to read or read at all any  
15 of the scholarly work on conspiracy theories authored by  
16 social scientists?

17 A Yes, over the years.

18 Q Joseph Uscinski's work?

19 A No.

20 Q Okay, whose?

21 A Defonda I think is his name.

22 Q Okay. Now you testified -

23 A The others - if I can just add to it. The others  
24 would be in a military context, military manuals that you  
25 would read.

26 Q What's the military teaching you about conspiracy  
27 theories?

1 A Not about conspiracies, just about information.

2 Q Okay. My question may have been overly broad and I  
3 apologize. I'd asked you if you made any effort to read the  
4 scholarly work on conspiracy theories in American light.  
5 And -

6 A Correct, Defonda's the only one that I can recall off  
7 the top of my head. I'm sure I've read other articles over  
8 time.

9 Q So when you get the call to prepare to testify  
10 against - withdrawn. You get the call to prepare to testify  
11 as an expert in a case involving Alex Jones.

12 A Correct.

13 Q You were familiar with him and Info Wars when you got  
14 the call.

15 A Yes.

16 Q You knew him to be a conspiracy theorist. Correct?

17 A I believe he advances conspiracies, yes.

18 Q Did -

19 ATTY. KOSKOFF: Objection, Your Honor. It's not  
20 a conspiracy theory, it's a lie.

21 THE COURT: I didn't hear what you said. What's  
22 the basis?

23 ATTY. KOSKOFF: We're not -

24 ATTY. PATTIS: We're not -

25 (Inaudible, the parties spoke over each other.)

26 ATTY. KOSKOFF: It's a lie, we established it's  
27 a lie.

1 THE COURT: Well I didn't hear a word either of  
2 you just said.

3 ATTY. KOSKOFF: Sorry, Your Honor.

4 THE COURT: So what was the basis for the -

5 ATTY. KOSKOFF: It's a lie.

6 ATTY. PATTIS: We're not talking about Sandy  
7 Hook, we haven't even gotten there.

8 ATTY. KOSKOFF: Why -

9 THE COURT: Can you just start your question  
10 over because I lost it now.

11 BY ATTORNEY PATTIS:

12 Q Sir, you get the call from the Koskoff Firm to  
13 testify -

14 A Correct.

15 Q - about Alex Jones in January of this year. Correct?

16 A Yes.

17 Q You knew a little bit about Info Wars because you've  
18 written about it before. Correct?

19 A Yes, I'm sure I've written about it at some point.

20 Q And you knew when you got the call that Alex Jones  
21 was a conspiracy theorist. Correct?

22 A I knew what Alex Jones says, yes.

23 Q Did you ever study him -

24 A I knew what he said.

25 Q - as part of your work with the FBI?

26 A No.

27 Q Had you ever studied him as part of your work for an

1 Intelligence Committee that you can talk about?

2 A No.

3 Q Okay. So did you make any effort to understand him  
4 in the context of American inautural (phonetic) history,  
5 American life by reading scholarly works, trying to figure  
6 out, who is this guy, what's this all about, independent of  
7 Sandy Hook? Did you make any effort to do that?

8 A No, that was not the context of why I was brought on  
9 to this.

10 Q No, the context was to attack him in this sea of  
11 lies. Correct?

12 ATTY. KOSKOFF: Objection.

13 THE COURT: Sustained.

14 BY ATTORNEY PATTIS:

15 Q Now you mentioned that you had a company, Miburo?

16 A Miburo, yes.

17 Q Miburo. Where did that name come from, it's an  
18 interesting name?

19 A It's a Japanese name for a ronin samurai, it was a  
20 group of ronin samurai.

21 Q Okay. Who did you sell the company to?

22 A Microsoft.

23 Q Okay. Are you independent working now, working  
24 independent?

25 A No, I'm fulfilling - this is my last role with Miburo  
26 right now.

27 Q So was it Miburo and Microsoft that was retained to

1 represent -

2 A No.

3 Q - for - it was you?

4 A Me.

5 Q So how is it that testifying here fulfills your last  
6 obligation for Miburo?

7 A Because the acquisition has happened since I was  
8 brought on by counsel.

9 Q And you thus far generated fees of about \$185,000?

10 A No, 158, I said this morning.

11 Q I'm dyslexic, thank you. Had you been paid those  
12 fees yet?

13 A The 158, yes.

14 Q Who paid them?

15 A Koskoff.

16 ATTY. PATTIS: May I have a moment, Judge?

17 THE COURT: Take your time.

18 BY ATTORNEY PATTIS:

19 Q How much time - withdrawn. Who at the Koskoff firm  
20 called you to ask you to consider testifying in this case?

21 A Alinor Sterling was the first person.

22 Q And were there - was there more than one conversation  
23 before you decided to take on the challenge?

24 A No, I think it was on the second conversation I  
25 agreed to it.

26 Q And was this with Alinor, with Attorney Sterling,  
27 excuse me?

1 A Attorney Sterling, yes.

2 Q What did she tell you about Sandy Hook in that first  
3 conversation?

4 A She told me the situation with the trial, that it was  
5 with respect to damages and they were looking to assess the  
6 volume and reach of Infowars.com, all of the social media  
7 sites and handles that they're broadcasting on related to  
8 Sandy Hook and different lies that were spoken.

9 Q And then what - how much time passed between the  
10 first conversation with Attorney Sterling and the second?

11 A I don't know off the top of my head, a few days or a  
12 week.

13 Q And you decided you're in?

14 A Yes, this would have been January, 2022.

15 Q And what was your rate structure?

16 A It was by hour, so it was based on the hours of  
17 myself and my research team.

18 Q Your hourly rate?

19 A I believe is 935 I think.

20 Q 935?

21 A Correct.

22 Q You get more for testifying in court?

23 A No.

24 Q Okay. She told you it was about damages?

25 A That this was a second phase of the trial. That it  
26 was with respect to the trial had already had been in  
27 process and were trying to assess.



1 Q Okay. That's what she told you?

2 A No, it was trying to understand the scope and that  
3 this is in terms of how the case would end.

4 Q She -

5 A I don't remember the exact words from January.

6 Q Yeah, I got it. But you understand this is a hearing  
7 in damages?

8 A I understood it to be that, yes.

9 Q Where the plaintiffs have to prove the damages that  
10 they're - that the jury should award them. Correct?

11 A The plaintiffs have to present a case and the jury  
12 decides.

13 Q Have you given this jury any information they can use  
14 to calculate damages for any plaintiff?

15 ATTY. KOSKOFF: Objection, Your Honor. That's  
16 a -

17 THE COURT: Sustained.

18 BY ATTORNEY PATTIS:

19 Q Now I gather than when you realized that you were  
20 coming into a hearing in damages, your focus was on the harm  
21 that Alex Jones and Info Wars caused these plaintiffs.  
22 Correct?

23 ATTY. KOSKOFF: Objection, Your Honor.

24 THE COURT: Overruled.

25 BY ATTORNEY PATTIS:

26 A My focus was on the internet traffic related to the  
27 content that he produced and the social media reach.

1 Q You testified earlier that you did - you used a  
2 number of search terms in the course of your work. Correct?

3 A Correct.

4 Q And there were actually 441 of those searches or -

5 A Correct.

6 Q - keywords and search terms are synonyms. Correct?

7 A Yes.

8 Q Different words expressing the same concept. Right?

9 A Yes.

10 Q Did you run the names of each of the plaintiffs in  
11 this case in that search term?

12 A I would have to go through the list to review.

13 Q You don't recall?

14 A I don't recall every single name.

15 Q Do you recall seeing any other names like Robby  
16 Parker in an Info Wars or Alex Jones broadcast?

17 A I would have to review the data to know.

18 Q You didn't do so before coming to court?

19 A I reviewed the data but it was - there was a lot of  
20 it.

21 Q You understood you are here to testify in a hearing  
22 in damages?

23 A Yes.

24 Q You had a duty to investigate, to inquire and be  
25 thorough. Correct?

26 A Correct.

27 Q Did you bring any notes with you to summarize

1 anything?

2 A I did not.

3 Q Your work early in your career in the military and in  
4 intelligence was focused largely on the Middle East.

5 Correct?

6 A For me Middle East and Africa.

7 Q North of the horn of Africa.

8 A Correct.

9 Q And describe for the jury where the horn of Africa  
10 is.

11 A Those would be the countries furthest to the east,  
12 namely Somalia, Kenya were the two.

13 Q And that was an interest you acquired at Monterey I  
14 believe. Correct?

15 A Correct.

16 Q You went from the Military Academy you fulfilled your  
17 service obligation, you went to the FBI stayed a year, went  
18 to graduate school and you had an advisor I believe, who was  
19 interested in that topic.

20 A Yes.

21 Q Were you an Arabic speaker at that time?

22 A No.

23 Q Are you now?

24 A No.

25 Q And you were first - it was through your focus on  
26 groups with a substantial nexus to countries in the horn of  
27 Africa that you first became aware of how effective social

1 media could be to contact, recruit and basically weaponize  
2 individual. Correct?

3 A Yes.

4 Q And when you developed that interest you realized  
5 that social media represented one phase of electronic  
6 communication in a digital world, it replaced the internet.  
7 Correct?

8 A No.

9 Q Well, I think what you told us earlier, in the  
10 internet you find content and in the social media world  
11 content finds you.

12 A Correct.

13 Q Does that make social media a qualitatively more  
14 effective way of influencing large groups of people?

15 A The work symbiotically, so if you do both it is more  
16 effective.

17 Q And one of the things that you focused on in your  
18 work was the fact, and in fact you wrote about this in your  
19 book. The Islamic State overtook Al Qaeda because it was  
20 better at using social media. Correct?

21 A I believe that to be correct, yes.

22 Q And you likened social media - you likened Islamic  
23 State's social media to - to group with an American  
24 politics. Didn't you?

25 A The way that it was used, yes. Meaning that  
26 regardless of what the organization is, the methods for use  
27 of which I referred to earlier were very consistent.

1 Q And the groups that you likened to Al Qaeda, those  
2 were groups located to the right of the political spectrum.  
3 Correct?

4 A In the book?

5 Q Yeah.

6 A I address two different generations of use of it on  
7 both sides of the political aisle.

8 Q What was the one on the left?

9 A The Obama presidential campaign was known for its  
10 being very dynamic in social media.

11 Q Were they terrorists?

12 A No.

13 Q Were they hackers?

14 A No.

15 Q Were the republican party?

16 A No.

17 Q Now I assume when you got the call in January of 2022  
18 to become an expert in this case you already heard of Sandy  
19 Hook.

20 A Correct.

21 Q And you understood that you would be called upon to  
22 testify.

23 A Yes.

24 Q And that you were - your intention obviously was to  
25 review all the material you were provided from whatever  
26 source. Correct?

27 A Yes. A

1 Q And you weren't limited to what you were provided.  
2 You also talked about doing searches of your own. Correct?

3 A Right, to identify missing data, yes.

4 Q Did you do any other searches to place this case in  
5 context? For example, there's a reporter at the New York  
6 Times named Elizabeth Williamson who wrote a book, Sandy  
7 Hook an American Tragedy in the Balance of Truth.

8 A Correct.

9 Q Did you read that book?

10 A Yes, I did.

11 Q And she's here in the courtroom today. Have you  
12 talked to her today?

13 A I did. She introduced herself.

14 Q You understand that this trial is not a chapter in  
15 "Battle for Truth", it's a hearing in damages. You  
16 understand that?

17 A Correct.

18 Q Can we see Exhibit 1E, Mr. Bruce.

19 THE CLERK: That is a full exhibit, Your Honor.

20 THE COURT: Thank you.

21 BY ATTORNEY PATTIS:

22 Q While that gets T'd up, what is a meme, sir?

23 A It would -

24 Q M-e-m-e?

25 A It would be a short video that expresses some sort of  
26 context around an event. And usually they go viral, meaning  
27 they're posted onto the internet. Other people enjoy the

1 meme or take the meme or try to recreate a similar meme with  
2 their own content.

3 Q And it's not just a video, they can be words or catch  
4 phrases.

5 A It could words, it can be images, it can be videos.

6 Q And one of the exhibits that was played today, I  
7 heard the words, the answer to 1984 is 1776. Did you hear  
8 that today?

9 A I'm not familiar with that. Could you say that  
10 again?

11 Q You never heard the expression from Alex Jones or  
12 anyone associated with him in the material that you  
13 reviewed, the answer to 1984 is 1776? Is that your  
14 testimony?

15 A Yes, I have heard that phrase.

16 Q And you associate with Alex Jones?

17 A I don't know that I would but...

18 Q Okay. Is that the sort of thing that would inspire  
19 anger?

20 A I'm confused by your question.

21 Q You talked before in response to questions by  
22 Attorney Koskoff.

23 ATTY. PATTIS: May I have a moment, Judge?

24 THE COURT: Take your time.

25 BY ATTORNEY PATTIS:

26 Q About a message.

27 A Correct.

1 Q And the message might inspire fear. Correct?

2 A Correct.

3 Q It might inspire anger. Correct?

4 A Yes. A

5 Q It might demonize people.

6 A It could.

7 Q And in an effective message mobilizes people around  
8 the negative emotions. Correct?

9 A That is one way to effective messaging.

10 Q And so the answer when you hear the expression, the  
11 answer to 1984, is that - does the year 1984 inspire any  
12 thoughts as you sit here?

13 A I'm assuming it relates to Orwell's book 1984.

14 Q So George Orwell wrote what's called a dystopian  
15 piece of fiction. Correct?

16 A Correct.

17 Q About a world in which government controlled  
18 everything regarding information. Correct?

19 A Yes.

20 Q And lies became a way of life. Correct?

21 A In the book, yes.

22 Q And that dystopian piece of fiction and the  
23 protagonist, the hero was a man who just wanted his own  
24 individual significance, he didn't want to buy the lie.  
25 Correct?

26 A It could be seen as that as one theme, yes.

27 Q When you hear, the answer to 1984 is 1776, does that



1 sound like an appeal to anger or an appeal to fear? Do you  
2 draw a distinction between that?

3 ATTY. KOSKOFF: Objection, Your Honor.

4 Objection, Your Honor.

5 BY ATTORNEY PATTIS:

6 A I've not spent much time thinking about that.

7 THE COURT: Hold on just one second, sir.

8 ATTY. KOSKOFF: We didn't talk about 1984 or  
9 1776 or any other date other than the dates we talked  
10 about, December 14<sup>th</sup>, 2012.

11 THE COURT: Are you objection beyond the scope  
12 or relevance or what?

13 ATTY. KOSKOFF: Absolutely, well both.

14 ATTY. PATTIS: It was raised in one of the  
15 videos.

16 THE COURT: I'll allow it, overruled.

17 ATTY. KOSKOFF: He said he didn't - he said he  
18 didn't - the witness - there's no foundation of when  
19 he said he didn't hear it. Now -

20 ATTY. PATTIS: It's for the jury.

21 ATTY. KOSKOFF: With what, to what -

22 THE COURT: I'm going to overrule the objection.

23 BY ATTORNEY PATTIS:

24 Q Show us 1E, Mr. Bruce, please.

25 (A video clip was played.)

26 MR. JONES: They can hit the ground running and  
27 build up and I said, this is the attack. Look,

1 people got to find the (inaudible) these last two  
2 months. I said, they are watching attacks, they're  
3 getting ready, I can see them warming up with Obama.  
4 You know, they got a bigger majority in the commerce  
5 now in the senate. They are going to come after our  
6 guns -

7 ATTY. PATTIS: Okay, stop it.

8 BY ATTORNEY PATTIS:

9 Q And you don't know who they are.

10 A No, not based on this clip.

11 Q But you're an experienced analyst. Correct?

12 A Yes.

13 Q Educated at West Point. Right?

14 A Yes.

15 Q And the institution now owned by Middlebury.

16 Correct?

17 A Yes.

18 Q Have you drawn any conclusions about who they might  
19 be?

20 A Just in the context of this, I believe he mentions  
21 President Obama at one point. I think it's in this clip.

22 Q And globalists too. Correct?

23 A Globalists, yes.

24 Q Can you play that again, John, or I mean start it  
25 over, start it up again?

26 (A video clip was played.)

27 MR. JONES: They can hit the ground running and

1 build up and I said, this is the attack. Look,  
2 people got to find the (inaudible) these last two  
3 months. I said, they are watching attacks, they're  
4 getting ready, I can see them warming up with Obama.  
5 You know, they got a bigger majority in the commerce  
6 now in the senate. They are going to come after our  
7 guns, look for mass shootings.

8 ATTY. PATTIS: Can you stop right there?

9 BY ATTORNEY PATTIS:

10 Q And again, is that him appealing to anger or fear?

11 A Yes.

12 Q Which one?

13 A He's trying to appeal the anger I believe in this.

14 He's claiming that this was premediated.

15 Q Okay. Maybe fear too?

16 A It's usually more than one but yes, it could be fear  
17 and anger.

18 Q And anger is the flip side of fear. Isn't it?

19 A I don't know, it's your opinion.

20 Q Actually it's not. How much - did you bother - did  
21 you get around to Aristotle's ethics at the Military  
22 Academy?

23 A I probably did somewhere in the neighborhood of 30  
24 years ago.

25 Q Not since?

26 A No.

27 Q Play the video again, John.

1 (A video clip was played.)

2 MR. JONES: They can hit the ground running and  
3 build up and I said, this is the attack. Look,  
4 people got to find the (inaudible) these last two  
5 months. I said, they are watching attacks, they're  
6 getting ready, I can see them warming up with Obama.  
7 You know, they got a bigger majority in the commerce  
8 now in the senate. They are going to come after our  
9 guns, look for mass shootings.

10 BY ATTORNEY PATTIS:

11 Q Go ahead John, please.

12 (The video clip continued.)

13 MR. JONES: And then magically it happens. They  
14 are coming, they are coming, they are coming.  
15 They've already taken over -

16 BY ATTORNEY PATTIS:

17 Q They are coming, they are coming, they are coming.

18 Are those words that - are those words designed to appeal to  
19 anger or fear or both?

20 A Both. Based on the image, both.

21 Q But you don't know who they are.

22 A It's not defined in this segment.

23 Q You haven't reached any conclusions based on your  
24 review of the material?

25 A No.

26 Q Do you think that Alex Jones genned up all these  
27 viewers just by talking or in other words, did Alex Jones

1 gen up all the fear that attracted people to him or is he  
2 appealing to something that people feel in the world and  
3 then respond to it? Do you know?

4 A I don't know why viewers watch Alex Jones.

5 Q Millions do though.

6 A Yes.

7 Q And they're a threat what they can do, that's a  
8 threat to democracy. Correct? It's a part of social media  
9 nationalism and click bate populism. Isn't it?

10 ATTY. KOSKOFF: Objection.

11 BY ATTORNEY PATTIS:

12 A I didn't say that.

13 THE COURT: Overruled.

14 ATTY. KOSKOFF: Objection.

15 THE COURT: Overruled.

16 BY ATTORNEY PATTIS:

17 Q Some things are worthy of fear. Are they not?

18 A I'm not sure what the context of this is but, yes,  
19 people can be scared.

20 Q Legitimately so.

21 A They could be.

22 Q People can be angry.

23 A Yes.

24 Q Legitimately so.

25 A Depends on what they see as legitimate.

26 Q Others can be demonized. Correct?

27 A Correct.

1 Q Legitimately so.

2 A I didn't say that.

3 Q Well when Paul Revere wrote from Concord to Lexington  
4 saying the British are coming, the British are coming, the  
5 British are coming, was he demonizing the British or was he  
6 inviting them to tea?

7 A He was sending a warning based on an invasion.

8 Q And people were angry and afraid and they revolted.

9 Correct? In 1776 we declared independence. Correct?

10 A Correct.

11 Q And you're aware that for millions of Americans, that  
12 sort of fight is brewing in the streets today. Are you not?

13 A No.

14 ATTY. KOSKOFF: Objection.

15 THE COURT: Sustained.

16 ATTY. KOSKOFF: Move to strike Mr. Pattis'  
17 comment.

18 THE COURT: So ordered. Let's move on.

19 ATTY. PATTIS: I will.

20 THE COURT: We can end here if you'd like.

21 ATTY. PATTIS: That would be perfect.

22 THE COURT: It's 4:25.

23 ATTY. PATTIS: Thank you, Judge.

24 THE COURT: Okay, so sir, we will see you back  
25 on Friday.

26 I know that you know what the rules are. Be  
27 very careful when you leave the courthouse today to

1           avoid anyone associated with the case or any media.

2           Continue to make all reasonable efforts to avoid  
3           any media coverage when you go home.

4           We'll start up promptly at 10 tomorrow. Ron  
5           will safeguard your notebooks and we will see you  
6           then.

7           We are adjourned for the day.

8           (Court adjourned.)

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NO: X06-UWY-CV18-6046436-S	:	SUPERIOR COURT
ERICA LAFFERTY	:	COMPLEX LITIGATION DOCKET
v.	:	AT WATERBURY, CONNECTICUT
ALEX EMERIC JONES	:	SEPTEMBER 20, 2022
.....		
NO: X06-UWY-CV18-6046437-S	:	SUPERIOR COURT
WILLIAM SHERLACH	:	COMPLEX LITIGATION DOCKET
v.	:	AT WATERBURY, CONNECTICUT
ALEX EMERIC JONES	:	SEPTEMBER 20, 2022
.....		
NO: X06-UWY-CV18-6046438-S	:	SUPERIOR COURT
WILLIAM SHERLACH	:	COMPLEX LITIGATION DOCKET
v.	:	AT WATERBURY, CONNECTICUT
ALEX EMERIC JONES	:	SEPTEMBER 20, 2022

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Waterbury, Waterbury, Connecticut, before the Honorable Barbara Bellis, Judge, on the 20<sup>th</sup> day of September, 2022.

Dated this 20<sup>th</sup> day of September, 2022 in Waterbury, Connecticut.

  
 Shannon LeRoy  
 Court Recording Monitor